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DEPT. OF TRANSPORTATION  
DOCKETS

2003 JUL 22 A 10:55

USCG-2003-14792-15  
USCG-2003-14749-40  
USCG-2003-14757-28  
USCG-2003-14878-7

July 18, 2003

Docket Management Facility  
U.S. Department of Transportation  
VIA FACSIMILE - 202 493 2251

**RE Dockets USCG-2003-14792,-14749,-14757, and 14878**

Dear Sirs,

Spirit Marine is the operator of fourteen harbor cruise dinner vessels in ports around the United States. We have been leaders in the industry for over twenty years and are members of the Passenger Vessel Association.

We are pleased to review the Coast Guard's analysis of the security risks posed to small passenger vessels and agree that the same regulatory measures applied to larger vessels are not justified for vessels of our industry's type.

Similarly, we adamantly agree with the Coast Guard's own economic analysis regarding AIS; that the proposed requirement will have a negative cost-benefit ratio. The Coast Guard themselves write that "the cost of AIS installation for the domestic fleet far outweighs the benefit".

Indeed, at a potential cost of \$140,000 for implementation in our fleet alone, the AIS proposition poses a considerable problem to our organization. The cost of such a system is, in fact, greater than our margins of profits in recent years.

Moreover, the AIS is fundamentally flawed in being able to provide increased security to either ports or the vessels they operate in. Recent marine security casualties such as the French oil tanker and the USS Cole speak to this flaw.

These vessels were not attacked by commercial vessels, the candidates for AIS outfitting. They were attacked by terrorists aboard swift recreational vessels of very small size. Our industry is primarily comprised of vessels with maximum speeds of 10 knots, operating on the same small harbor waters day after day on which both their hull profile and night time navigation light signature is easily identified by other commercial operators.

Including AIS on the bridges of these vessels will not provide operators with any additional information as to the identity of other commercial craft not already available through basic visual or radio means.


Nor, will port command centers, such as the current VTSs, gain information on vessels which could pose a threat to other vessels, for, as mentioned already, it is not the slow moving commercial craft which pose the threats.

Simply put, if terrorists wish to harm commercial craft and their passengers, why would they attempt to pass through a company's boarding process, overtake a marine crew, fight off a large number of passengers, attempt to navigate a relatively awkwardly sized vessel, and move at 10 knots toward another significantly sized vessel, when they could simply drive a small private vessel, with no security oversight, at great speed?

For a port control center to know only where all the slow moving craft are does nothing to eliminate the real threat; the small and agile recreational vessel that is far more accessible to a terrorist.

AIS makes no practical sense and poses a considerable financial burden to our business and the ports that would be required to outfit and man central monitoring stations.

Sincerely,



Michael Glasfeld  
President